

**Public Works Department****Office of the Director**

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December 18, 2006

Ms. Peggy Casey
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Federal Highway Administration (FHWA)
3220 West Edgewood, Suite H
Jefferson City, MO 65109

Mr. Kevin Keith
Chief Engineer
Missouri Department of Transportation (MoDOT)
P.O. Box 270
Jefferson City, MO 65102

Re: I-29/I-35 Paseo Bridge FEIS Comments

Dear Ms. Casey and Mr. Keith:

The I-29/I-35 Paseo Bridge Corridor improvements represent a critical opportunity to improve safety, capacity, operations and access, while moving people, goods and services in various transportation modes along a critical corridor with major employment, residential and business interests. Given the long-term significance of this project, the City of Kansas City, Missouri, Departments of Public Works, Planning and Development, and Parks and Recreation appreciate the opportunity to provide the following comments and concerns regarding the I-29/I-35 Paseo Bridge Final Environmental Impact Statement (FEIS). We appreciate your thoughtful consideration of these comments and look forward to working with MoDOT, the FHWA and your project team to address these issues and to ensure the project is a success for the entire Kansas City metropolitan area.

Alignments/Capacity/Local Traffic Conditions

The City is concerned that several elements of the preferred alternative could adversely affect the capacity of the system and negatively impact local traffic conditions in adjacent neighborhoods, as well as the Central Business District (CBD). Additional study is needed by the Design-Build team, MoDOT, FHWA and City staff to ensure the improvements positively impact traffic flow throughout the corridor and adjacent areas. The following areas are of concern to the City and/or require further cooperation between the City and MoDOT:

1. Front Street Interchange: On November 30, 2006, City Council adopted Resolution No. 061289, requesting the Missouri Highways and Transportation Commission include a single point urban interchange (SPUI) as part of the East Front Street Interchange Improvements and expressing a willingness to consider contributing \$10 million to the cost of the improvements. The City Manager will be providing a recommendation for funding source(s) to help defray the cost of the SPUI by the end of January 2007, so that a Cooperative Agreement between MoDOT and the City can be executed. As part of this Agreement, the City requests confirmation of the projected incremental cost increase of the SPUI over the preferred alternative in order to support the City's contribution of up to \$10 million for the actual costs of the interchange improvements.
 - 11A The City and MoDOT have an agreement regarding the transfer of ownership of Front Street from the City to MoDOT under which the City is obligated for the right-of-way and environmental costs associated with the standards of a 4-lane facility. As part of the I-29/I-35 improvements, MoDOT needs to secure the necessary right-of-way, assume any associated environmental costs, and to construct Front Street to this 4-lane standard within the project area. Therefore, the City will not be responsible for securing the right-of-way or the environmental costs within this section of Front Street, but will assume the responsibilities for the Front Street right-of-way/environmental costs east of the project area boundaries.
 2. The Paseo Boulevard – The City is concerned that due to the proposed closure of two access points in the East Loop, traffic flow will be increased and negatively impacted at the intersection of US-24/Independence Avenue and The Paseo Boulevard. The City therefore requests verification that the Project has no negative impact to the US-24/Independence Avenue and The Paseo Boulevard intersection.
 - 11B In order to mitigate any potential impact on this intersection and to remedy past environmental impacts caused by the corridor in this area, MoDOT should assume the obligation for the realignment costs/improvements to The Paseo Boulevard currently reflected on Plate A-05 (CBD North Loop Subcorridor) as a City project. This mitigation effort will help provide some environmental justice for adjoining communities, neighborhood parks and public open spaces negatively impacted by the corridor's original construction.
 3. Access – The preferred alternative eliminates several access locations both in the East Loop and the North Loop (see below). The City is very concerned about the impact of these removals on traffic flows and congestion in the CBD and adjacent neighborhoods. On past projects when the City has eliminated an access location, MoDOT has required the City replace and relocate that access. The City expects
 - 11C that as existing on and off-ramp access locations are eliminated during the Design-Build process, MoDOT and the Design-Build team will evaluate these eliminations thoroughly and submit proof to the City that alternative replacements/relocations are identified and incorporated into the final Project.
- 6th Street/NB I-29 – The City disapproves of the removal of the proposed access ramp from EB 6th Street to NB I-29 (included in the preferred alternative of the DEIS). A major traffic issue for the region is access from the CBD to NB I-29 in the PM peak

hour. The preferred alternative does not improve access to NB I-29 from the CBD and puts into question the effectiveness of investing in extra mainline capacity when access out of the CBD is not improved.

EB I-70/Admiral – Eliminating the access ramp from Admiral to EB I-70 forces traffic leaving the CBD to use the ramp from 10th Street to EB I-70 creating additional traffic loading to 10th Street that it cannot handle. This creates a failure situation on 10th Street due to the close proximity of the ramp to Charlotte Street.

Admiral/WB I-70 – Eliminating the access from WB I-70 to Admiral and Independence takes all access off the freeway system to the East Loop and forces motorists to the North Loop to access the CBD, increasing traffic on those intersections and forcing more vehicles to use the sub-standard acceleration/deceleration lanes on the North Loop. Since the FEIS no longer includes freeway ramp acceleration/deceleration improvements, the City feels MoDOT is making traffic flow and safety worse than the current situation.

10th Street – The elimination of access ramps for both NB and SB I-70 in the East Loop will concentrate additional traffic onto 10th Street, as stated above, creating a possible failure situation. The realignment of the NB access ramp, while improving the merge lane, will not alleviate the additional burden on 10th Street. The City requests that MoDOT investigate access to NB I-35 from 8th, 9th, and 10th Streets by modifying the ramp locations on the East Loop.

Future Project – The improvements to the east side of the East Loop need to accommodate the plans for the consolidated charities center planned east of the Loop between 10th and 8th Streets. The City requests that MoDOT contact the appropriate organizations and work to minimize the impact to those facilities and the charities' costs associated with constructing those facilities.

4. Broadway and I-35 Interchange – The Broadway interchange preferred alternative is a puzzling solution. On Page 35 of Appendix H, Alternative 2 has the same positive impacts as Alternative 1 (SPUI) but less impact to the built environment and at a lower cost. The two major PM peak movements are the NBI-35 to NB US 169 and the NB Broadway movement. Alternative 1 does not reduce the occurrence of that conflict and has a higher associated cost than Alternative 2.

- 11D The disconnection of 5th Street causes a tremendous traffic impact to the local street system and turns 4th Street into an industrial collector. Under the preferred alternative, trucks leaving the Central Industrial District (CID) will be forced to travel along 4th Street and onto Delaware Street to access the interstate. This will create a burden for the City with increased vehicle loads and higher traffic volumes than the local residential streets are built to handle. The City will face higher street maintenance costs associated with accelerated deterioration of the pavement and repeated curb and sidewalk reconstruction caused by trucks running over these facilities due to a sub-standard turning radius. The City requests MoDOT investigate providing access to WB I-70 from both NB and SB Beardsley Road.

The City is also concerned about the disconnection of 5th Street as this could have a negative economic impact on the commercial/residential properties that front 5th Street both immediately east and west of Broadway.

5. Facility Closure – The City is deeply concerned about the possible total closure of any segment of the Interstate system in the CBD. The City will require an agreement with MoDOT for detour routes much like the agreement that was executed when the Paseo Bridge was closed in 2005 for rehabilitation. The City will also require MoDOT to return the local street system to the condition that it was in before the accelerated deterioration of the streets caused by increased truck and vehicle traffic traveling along the detours. The City will also require that MoDOT improve the traffic signals on the detour routes so the signals can be interconnected and monitored remotely to optimize signal timing and control delays. The City and MoDOT should use an ITS approach to change traffic signal phases in the event that other situations cause increased traffic loads on the detour due to accidents or closures of other parts of the Kansas City Interstate system.
- 11E

Multimodal Connectivity

The City is committed to improving the livability of Kansas City neighborhoods and strongly supports the integration of transportation choices, pedestrian, bicycle, and transit, into the City's infrastructure improvements. The City is committed to working with MoDOT and the Design-Build team to ensure all transportation choices are adequately accommodated in the I-29/I-35 Paseo Bridge improvements in order to ensure that all Kansas Citians have access to multiple transportation modes.

1. Integration of multi-modal accommodations into the design of the Paseo Bridge – On May 5, 2006, City Council adopted Resolution No. 060564, which urged MoDOT to "incorporate into the planning and construction of the new Paseo Bridge bicycle, pedestrian and public transit access across the Missouri River." The region expressed further supported for multi-modal accommodations when the Bicycle/Pedestrian Advisory Committee, the Total Transportation Policy Committee, as well as the MARC Board recommended bicycle and pedestrian accommodations on or adjacent to the Paseo be explicitly included in the RFP/RFQ for design.
- 11F
2. Expedited bicycle/pedestrian improvements to the HAB crossing – The City of Kansas City commends MoDOT for incorporating a bicycle/pedestrian crossing of the Missouri River into the FEIS. While the City supports this improvement, the City strongly urges MoDOT to expedite design and construction of the proposed improvements to the Heart of America Bridge (HAB). The need for these improvements is immediate and cannot wait until 2012. City staff commits to work with MoDOT to identify funding opportunities so that these improvements can be expedited. Further, City staff looks forward to continuing to serve on the Core Team to ensure that the final design of the bike/ped facility is both functional for the end-users and presents a safe, inviting mode for users to enjoy the Missouri River/Riverfront area. These accommodations will further support the City's efforts to develop a Citywide pedestrian and bicycle system (Citywide Trails Plan) by eliminating the Missouri River
- 11G

as a major barrier for pedestrians and bicyclists. This action is a critical step towards improving the multi-modal transportation system in Kansas City.

3. Address pedestrian/bicycle connectivity throughout study area – The City is committed to providing the residents, employees and visitors of the study area with the ability to walk throughout the City with minimal or no disruptions in sidewalks along local streets. Therefore, the City will require MoDOT to replace any sidewalks or sidewalk connections that exist today and provide sidewalk accommodations and enhancements similar to those over the I-670 on any reconstructed or rehabilitated bridge connecting City streets. Such action will ensure that adjacent neighborhoods (Northeast, Columbus Park, CBD, River Market) have adequate access to cross the interstate system. These requirements are supported by the Kansas City Walkability Plan, Resolution No. 030211, which was approved by City Council on March 20, 2003, as a policy guide for increasing transportation choice and adopted as a supplement to the FOCUS Kansas City Plan. The adopted Walkability Plan recommends that "pedestrian network mobility improvements should be considered an integral part of all new transportation improvements, including major reconstruction of roadways." It further recommends the City and MoDOT collaborate to encourage more pedestrian-friendly MoDOT infrastructure where studies indicate pedestrian activity.

I-35 Crossings - The pedestrian mobility study conducted as part of the Walkability Plan identified the I-35 as a major barrier for pedestrians between downtown and the River Market/Columbus Park area. The preferred alternative will eliminate all pedestrian access at Broadway. In order to mitigate this action, MoDOT should incorporate an improved pedestrian connection(s) at one of the other crossings over the I-35 corridor.

5th/6th Street Improvements - Any reconstruction or widening of 5th and 6th Streets needs sidewalk accommodations. When MoDOT built the North Loop, the 5th Street frontage road did not include sidewalks and created a barrier between the City Market and the CBD. The City requires MoDOT to construct sidewalks to re-establish the historical connections between these two vibrant and historical areas of the City. Also, the 5th and 6th Street frontage roads create a visual barrier and were built with vehicle transportation needs only, which creates a "hard" visual of the area. The City would like to see some streetscape improvements to these frontage areas to soften the feel of the area to residents and motorists. This will also introduce some traffic calming effects since motorists will feel that they are driving through a residential area and this will reduce speeds and traffic accidents at intersections and at the merge areas at the ramp terminals.

Paseo ramp bridge - The City would like to see the Columbus Park neighborhood connections restored to their pre-freeway history. The ramp from SB I-29 to Paseo ramp bridge will be re-constructed. The City would like MoDOT to add a sidewalk on that bridge that would tie the ball fields on the south side of the freeway and the sidewalks on the Paseo Boulevard to the Columbus Park neighborhood. In the past, there was a pedestrian bridge over the Interstate. This was removed in the early 2000s and nothing has been done to replace it. By adding a 6' sidewalk along the

SB I-29 to Paseo ramp bridge, sidewalks can be constructed to Lydia and Independence Avenue to restore this pedestrian connection. This would also provide a means to link two scenic byways (Riverfront Heritage Trail and Cliff Drive). In addition, the federal government is looking to consolidate some federal agencies in the Berkeley Riverfront Park area. These agencies provide social services to low/moderate income people who may not have vehicles. The City also has a service area for low/moderate income people southeast of the Independence and Paseo intersection. The City feels strongly that the pedestrian connection from the Columbus/Berkeley Park area to the Independence/Paseo area needs to be accommodated as part of this project by constructing a sidewalk on the SB I-29 to Paseo ramp. The nearest connection for residents requires them to walk from Paseo/Independence to Independence and Holmes and then through the Columbus Park area, down the Chestnut Trafficway and eventually to Berkeley Riverfront Park. This detour exceeds a mile and would cause residents needing to use federal services to walk an extra hour to reach their destination.

US-24/Independence Avenue - US-24/Independence Avenue also requires sidewalk access. Currently, Independence has bus stops along it without any pedestrian access. In order to support the growth of the residential neighborhoods in the River Market and Columbus Park areas, pedestrian access along Independence is necessary. The City is currently implementing improvements along Independence, east of the study area, which could be extended along the I-35 corridor, creating a safe, walkable east-west connector, while also creating a desirable sense of place.

Front Street - The City also desires to have bicycle and pedestrian needs accommodated with the Front Street improvements. This is a major east-west regional trail connector, linking up to Berkeley Riverfront Park, Parks and Recreation's Riverfront Park, Cliff Drive State Scenic Byway and the Riverfront Heritage Trail State Scenic Byway, and this connection needs to be maintained.

Broadway interchange - Under the preferred option for the Broadway interchange, the pedestrian linkage along both 5th and 6th Streets is eliminated. The sidewalk is not shown to connect and there is no traffic signal at those locations that would allow walkers and those that have disabilities to safely cross Broadway. This would cause residents additional delay and safety issues. The blocks on both sides of the 5th and Broadway intersection are being redeveloped as predominant residential uses with storefront commercial or office. By removing the pedestrian connections, MoDOT will hinder the viability of these redevelopments and storefronts which create vibrant neighborhoods. MoDOT needs to mitigate this action through additional pedestrian improvements.

Coordination

- 111 The City of Kansas City supports MoDOT's plans to utilize a Design-Build process to develop solutions for the I-29/I-35 Corridor. The City would like to emphasize the critical importance of MoDOT and FHWA coordinating with local stakeholders. It is essential that the community be kept informed during the Design-Build process. In addition, continued participation of KCMO technical staff is critical. The City strongly

recommends the establishment of a Technical Committee of MoDOT, FHWA, KCMO technical staff and other stakeholders to ensure local concerns/priorities are addressed during the Design-Build process. Through such a collaborative partnership, this critical project can be a success enjoyed by the entire metropolitan area and establish a best practice for future critical infrastructure projects.

The Public Works, Planning and Development, and Parks and Recreation Departments greatly appreciate the opportunity to comment on the FEIS, and look forward to working with MoDOT, FHWA and the Design-Build team. Should you have any questions or comments, do not hesitate to contact us.



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Mid-America Regional Council

December 18, 2006

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Dear Ms. Casey and Mr. Keith:

MARC staff has reviewed the Interstate 29/35 Paseo Bridge Corridor Final Environmental Impact Statement (FEIS) and offers the following provisional comments on this document to FHWA and MoDOT pending action from the MARC Total Transportation Policy Committee and Board of Directors. Staff intends to share these comments with both groups when they meet on December 19, 2006. We will transmit any changes to these comments resulting from action by these groups as soon as practicable after this date.

First, MARC submitted a number of comments on the Draft EIS. We note that our comments are discussed in the Final EIS in Chapter V in comment codes 22A through 22L and are addressed in modifications to the DEIS throughout the FEIS. We appreciate MoDOT's and FHWA's thoughtful consideration of our comments and are generally satisfied with the responses to them. However, we believe that some additional clarification is required for comments 22I and 22J which address community involvement and bicycle/pedestrian transportation issues, respectively.

12A Regarding community involvement (22I), MARC recognizes and appreciates the fact that MoDOT has established the Community Advisory Group to assist in the identification and development of strategies to address community concerns related to the procurement of the contractor for the kcalCON design-build project as described in commitment 21 in the Summary of the FEIS. We believe that this group will be very helpful in providing MoDOT with good advice and broad perspectives on issues of importance to the different communities, neighborhoods and constituents impacted by this project. However, we are somewhat concerned that only one opportunity will be provided to "capture and document the public's priorities for the project" at one public meeting prior to awarding the design-build contract. We believe that one meeting will be too limited an opportunity to effectively engage the public in all of the different neighborhoods and communities impacted by this project. We encourage MoDOT and FHWA to modify this commitment to allow for a more robust public engagement process regarding issues such as the project scope, bridge type, corridor access, traffic management and other community concerns prior to the selection of the design-build contractor. By expanding this discussion, we believe that MoDOT will increase the level of community knowledge, understanding and support for this project.

12B Regarding bicycle and pedestrian access across the Missouri River in this corridor (22J), on October 31, 2006, the MARC Board of Directors adopted the following recommendations for the Missouri River Crossing Feasibility Study as submitted by the Total Transportation Policy Committee (TTPC) and the Bicycle/Pedestrian Advisory Committee (BPAC):

Chair
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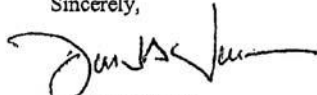
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1. TTPC and BPAC recommend that high quality, safe, practical and appropriate bicycle pedestrian accommodations be provided on or adjacent to the Paseo from Front Street to 16th Street, and that this be explicitly included in the RFP/RFQ for design.
2. TTPC and BPAC recognize that the Heart of America Bridge is currently an option for bicycle/pedestrian access across the Missouri River and needs significant improvements to increase the safety of all users; and therefore, TTPC and BPAC recommend the necessary improvements be made as soon as practicable by MoDOT.
3. MARC and MoDOT will work cooperatively with other appropriate stakeholders to further explore some of the crossings evaluated in this [River Crossing Feasibility] study as well as others.

MARC applauds MoDOT for its work to examine and consider options for safe, feasible and practical accommodations for pedestrians and bicyclists in this corridor. We believe that this study provided a good faith effort at engaging the public and was a good example of the thoughtful consideration for pedestrian and bicycle transportation contemplated in MARC's River Crossing Policy adopted in April of 2006. While we note and appreciate that the Final EIS contains a strong commitment to improving the pedestrian and bicycle crossing on the Heart of America Bridge, this document is silent on the issue of including further study of pedestrian and bicycle accommodations in the design of the new kcICON river crossing. Our understanding from discussions with MoDOT staff is that MoDOT does intend to include these provisions in the kcICON design-build procurement documents. Given the controversy and concern expressed about this issue in many of the other comments on the DEIS, MARC would recommend that MoDOT and FHWA include this commitment in the FEIS. If this commitment is not written into the FEIS, MoDOT should be very clear about its intentions regarding this issue as it engages the various stakeholder groups in the community for the kcICON project.

As always, MARC appreciates the opportunity to continue to work as a partner with MoDOT and FHWA to complete the initial planning for this urgently needed, high-profile and high-priority transportation improvement. Please feel free to contact me at (816) 474-4240 with any questions about MARC's position on this Environmental Impact Statement.

Sincerely,



David A. Warm
Executive Director

Cc: Lee Ann Kell – MoDOT District 4